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REMARKS

This Application has been carefully reviewed in light of the Office Action mailed March 30, 2004. Applicant appreciates the Examiner's consideration of the Application and allowance of Claim 45. Claims 5, 14, 31, and 40 have been canceled, and Claims 1, 10, 19, 27, and 36 have been amended to clarify, more particularly point out, and more distinctly claim inventive concepts previously present in these claims. Applicant makes no admission that these amendments narrow the scope of the claims or that the amendments are required for patentability. Applicant respectfully submits that no new matter has been added by the amendments to the claims. In order to advance prosecution of this Application, Applicant has responded to each notation by the Examiner. Applicant respectfully requests reconsideration and favorable action in this case.

Section 102 Rejection

The Examiner rejects Claims 1, 2, 5, 10, 11, 14, 19, 20, 27, 28, 31, 36, 37, and 40 under 35 U.S.C. § 102(e) as being unpatentable over U.S. Patent Application No. 10/454,533 of Jonas et al. ("*Jonas*"). Applicant respectfully traverses this rejection for the reasons discussed below.

Applicant respectfully submits that *Jonas* fails to disclose, or even teach or suggest, the elements specifically recited in Applicant's claims. For example, *Jonas* fails to disclose, or even teach or suggest, a signaling gateway operable to:

"establish the destination circuit from the message";

"determine a circuit identifier identifying the destination circuit"; and

"determine the destination voice gateway based on the circuit identifier identifying the destination circuit" (recited in Claim 1, as amended).

Jonas discloses a method and system for routing and transmitting voice conversations across a packet switched computer network and a circuit switched public telephone network. (*Jonas*, Abstract.) According to *Jonas*:

> The router authentication server 500 determines the optimal phone switch 600 to route the call through based on the costs of connecting the called party to the phone switch over the circuit switched telephone network 300, as well as the traffic through the possible phone switches 600.

(*Jonas*, paragraph 0030, lines 5-10.) That is, *Jonas* discloses that the router authentication server 500 determines the optimal phone switch 600 through which to route a call based on cost and traffic. *Jonas*, however, fails to disclose, or even teach or suggest, a signaling gateway operable to "establish the destination circuit from the message," "determine a circuit identifier identifying the destination circuit," and "determine the destination voice gateway based on the circuit identifier identifying the destination circuit," as recited in amended Claim 1. For at least these reasons, *Jonas* fails to disclose, teach, or suggest the combination of elements specifically recited in Applicant's independent Claim 1.

As another example, *Jonas* fails to disclose, or even teach or suggest:

a signaling gateway operable to "execute one or more message transfer parts," "each message transfer part of the one or more message transfer parts being operable to direct the message to at least one of the voice gateways"; and

at least one voice gateway operable to "execute an integrated services digital network user part," "the integrated services digital network user part of the at least one voice gateway being operable to provide signaling information to a circuit of the circuits" (recited in amended Claim 1).

The Examiner relies on a passage of *Jonas* to provide such teaching. (Office Action, page 3, paragraph 1.)

> The client application software 101 creates a call connection request packet containing the called party's phone number and the user's access information, such as credit card information or the user's access name and password. The called party's number may determined [*sic*] through an optional local or on-line directory. The call connection request packet is sent from the personal computer 100 to the router authentication server 500 (FIG. 2A). Upon receipt of the call connection request packet, the router authentication server 500 verifies the caller's access name and password and determines the appropriate phone switch 600 to route the call through based on a number of factors, including the traffic load on each of the phone switches 600, and the cost of transmitting the voice conversation from the potential phone switches 600 to the called party over the circuit switched telephone network 300.

(*Jonas*, paragraph 0040.)

The passage, however, fails to disclose, or even teach or suggest, a signaling gateway operable to "execute one or more message transfer parts," "each message transfer part of the one or more message transfer parts being operable to direct the message to at least one of the voice gateways," and at least one voice gateway operable to "execute an integrated services

digital network user part," "the integrated services digital network user part of the at least one voice gateway being operable to provide signaling information to a circuit of the circuits," recited in amended Claim 1. For at least these reasons, *Jonas* fails to disclose, teach, or suggest the combination of elements specifically recited in Applicant's independent Claim 1.

Applicant's dependent claims are allowable based on their dependence on the independent claim and further because they recite numerous additional patentable distinctions over the reference of the rejection. Because Applicant believes he has amply demonstrated the allowability of the independent claim over the reference of the rejection, and to avoid burdening the record, Applicant has not provided detailed remarks concerning these dependent claims. Applicant, however, remains ready to provide such remarks if it becomes appropriate to do so.

Independent Claims 10, 19, 27, and 36 recite certain limitations substantially similar to those recited in independent Claim 1. Accordingly, for at least the same reasons, Applicant also respectfully requests reconsideration and allowance of independent Claim 10, 19, 27, and 36.

Section 103(a) Rejection

The Examiner rejects Claims 3, 4, 12, 13, 21, 22, 29, 30, 38, and 39 under 35 U.S.C. § 103(a) as being unpatentable over *Jonas* in light of U.S. Patent No. 6,542,503 to Xu et al. ("*Xu*"). Applicant respectfully traverses this rejection for the reasons discussed below.

As discussed above, *Jonas* fails to disclose, teach, or suggest the combination of elements specifically recited in Applicant's independent claims. Moreover, *Jonas*, even in combination with *Xu*, fails to disclose, teach, or suggest the combination of elements specifically recited in Applicant's independent claims.

Applicant's dependent claims are allowable based on their dependence on the independent claims and further because they recite numerous additional patentable distinctions over the *Jonas-Xu* combination suggested by the Examiner. Because Applicant believes he has amply demonstrated the allowability of the independent claims over the *Jonas-Xu* combination, and to avoid burdening the record, Applicant has not provided detailed remarks concerning these dependent claims. Applicant, however, remains ready to provide such remarks if it becomes appropriate to do so.

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Applicant respectfully requests reconsideration and allowance of Claims 3, 4, 12, 13, 21, 22, 29, 30, 38, and 39.

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CONCLUSION

Applicant has made an earnest attempt to place this case in condition for allowance. For at least the foregoing reasons, Applicant respectfully requests full allowance of all the pending claims.

If the Examiner believes a telephone conference would advance prosecution of this case in any way, the Examiner is invited to contact Keiko Ichiye, the Attorney for Applicant, at the Examiner's convenience at (214) 953-6494.

Although Applicant believes no fees are due, the Commissioner is hereby authorized to charge any fees or credit any overpayments to Deposit Account No. 02-0384 of Baker Botts L.L.P.

Respectfully submitted,

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